

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Alexandria Division*

UNITED STATES OF AMERICA

v.

JAVON RUSTIN LOUIS PAIGE,

VINCENT HENRY KIRKLAND, JR.,

and

BRIANNA MAMIE OCEOLIA ARCHIE,

Defendants.

Case No. 1:24-mj-487

**UNDER SEAL**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Charles Rooney, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the FBI and have been since 2008. I am currently assigned to the Violent Crimes Task Force of the Washington, D.C., Field Office. In my capacity as a law enforcement officer, I have conducted arrests and obtained search warrants and court orders. I have investigated violent crimes, including bank robberies, armored car robberies, assaults, carjackings, kidnappings, and threats, that have resulted in arrests and convictions.

2. I submit this affidavit in support of a criminal complaint charging JAVON RUSTIN LOUIS PAIGE (“PAIGE”) and VINCENT HENRY KIRKLAND, JR. (“KIRKLAND”) with using, carrying, and brandishing a firearm during and in relation to a crime of violence, namely, Hobbs Act Robbery (18 U.S.C. § 1951), in violation of 18 U.S.C. § 924(c)(1)(A)(ii), and BRIANNA

MAMIE OCEOLIA ARCHIE (“ARCHIE”) with Hobbs Act Robbery, in violation of 18 U.S.C. §§ 1951 and 2.

3. The facts in this affidavit are based upon my training and experience, my personal knowledge and observations, and my review of the evidence (including police reports, affidavits, photographs, surveillance video, and body worn camera footage), as well as information obtained from other law enforcement officers and witnesses. Except as explicitly set forth below, I have not distinguished in this affidavit facts of which I have personal knowledge and facts of which I have hearsay knowledge. This affidavit is intended to show only that there is probable cause and does not include each and every fact and matter observed by me or known to the United States.

### **PROBABLE CAUSE**

4. The FBI, Fairfax County Police Department (“FCPD”), and Prince William County Police Department (“PWCPD”) have been investigating a series of cellular phone store robberies that occurred in the summer of 2024. As detailed below, law enforcement believes that PAIGE and KIRKLAND participated in a robbery of a Boost Mobile store on July 25, 2024, during which PAIGE brandished a firearm, and that PAIGE, KIRKLAND, and ARCHIE participated in a robbery of a Geeks Zone store on August 13, 2024, during which both PAIGE and KIRKLAND brandished firearms.

#### The Boost Mobile Robbery

5. On July 25, 2024, at approximately 11:19 a.m., two subjects robbed a Boost Mobile store (“Boost Mobile”) located at 6531 Little River Turnpike, Alexandria, Virginia, which is in Fairfax County within the Eastern District of Virginia. Boost Mobile, which is located in a shopping center with other stores attached on both sides, is a commercial establishment that sells cellular phones and other products and is a business that was engaged in and that affected interstate commerce. In addition to taking items from three victims inside the store, the subjects stole

merchandise from Boost Mobile, including approximately 41 phones and approximately \$5,000 in United States currency.



(Google Maps Aerial View of 6531 Little River Turnpike, Alexandria, Virginia)

6. Based on surveillance video from Boost Mobile, which included an audio recording from a camera inside the store, the two subjects can be described as follows. The first individual – referred to herein as “Subject 1” (who, as explained in this affidavit, was later identified as KIRKLAND) – wore dark clothing, gray New Balance sneakers, white gloves with red/orange palms, a hood pulled up over his head, and his face partially covered by what appeared to be a black mask but with his eyes and nose visible. Subject 1 carried a dark colored backpack. The second individual – referred to herein as “Subject 2” (who, as explained in this affidavit, was later identified as PAIGE) – wore a gray top, dark pants, white sneakers with black trim, white gloves with red/orange palms (which appeared similar to those worn by Subject 1), a hood pulled up over his head, and a white covid-style mask that partially covered his face. Subject 2 carried a dark colored backpack and was armed with a black handgun. Both subjects appeared to be black males.



(Subjects 1 & 2 inside Boost Mobile)



(Subject 2 inside Boost Mobile)



(Subject 2's sneakers)

7. According to Boost Mobile video, as both subjects entered the Boost Mobile, they encountered an employee of the store (“Victim 1”), who was assisting a customer (“Victim 2”) at the cash register. Subject 2 pointed his handgun at the two victims. According to the audio recording, one of the subjects initially ordered the two victims to lay on the ground, and ultimately both victims were told to get in the back of the store. Subject 1 started to drag Victim 2 across the floor towards the back and threatened to shoot, before Victim 2 was able to get up and walk to the rear. In the back of the store, the subjects encountered the store manager (“Victim 3”). According to the audio recording, one of the subjects demanded cellular phones, specifically iPhone 15 Pros.

8. Surveillance video captured the movement and actions of both subjects and the victims at the back of the store. Both subjects stomped their feet on the back of Victim 1’s head as he laid on the ground. Subject 2 appeared to stomp his foot down in the area where Victim 2

was lying, but that view was partially obscured. Subject 2 also struck Victim 3 in the back of the head with what appeared to be the butt end of his handgun.

9. According to Boost Mobile video, Subject 1 loaded items from the Boost Mobile into his backpack and a trashcan that was inside the store, and Subject 2 also loaded items from the store into his backpack. Subject 1 fled the store on foot with the trashcan and turned right as he exited, running east. Before departing, Subject 2 leaned over both Victim 1 and Victim 2. It was later determined through interviews that both victims were sprayed in the face with what was believed to have been pepper spray. Based on surveillance video, neither victim appeared to provoke Subject 2 into being pepper sprayed. Subject 2 fled the store, and surveillance video captured him entering the front passenger side door of a silver vehicle, which drove away.

10. Victim 3 called law enforcement, and FCPD responded to the scene and interviewed all three victims. Victim 1 reported that his phone was stolen, and Victim 2 and Victim 3 reported that their wallets were stolen. According to surveillance video, Subject 2 appeared to take personal items from Victim 1 and Victim 2 and, at one point, started hitting an object consistent with a phone against a desk in the back room. Victim 1 was treated by medics at the scene and, based on body worn camera footage, had visible abrasions to his cheek and chin.

11. In addition to video from Boost Mobile, law enforcement recovered surveillance video from other stores within the shopping center, including MetroPCS and Eternal Bridal. Boost Mobile is located between MetroPCS and Eternal Bridal. According to MetroPCS video, at approximately 11:12 a.m., a silver vehicle entered the parking lot of the shopping center from Little River Turnpike and drove east. This vehicle was also seen on the Eternal Bridal video entering the shopping center and driving east in the parking lot. The vehicle continued past Eternal Bridal towards the east end of the shopping center and out of the camera's view. Approximately a minute

and a half later, a silver vehicle that appeared to be the same vehicle drove past both Eternal Bridal and MetroPCS. It then slowly reversed and again passed the stores, including Boost Mobile, before driving toward the east end of the shopping center and out of the camera's view.

12. According to Boost Mobile video, at approximately 11:19 a.m., Subject 1 and Subject 2 entered Boost Mobile. Both subjects came from the direction the silver vehicle was last seen in the Eternal Bridal video. At approximately 11:24 a.m., Subject 1 fled Boost Mobile after the robbery and headed east in the parking lot in the direction the silver vehicle was last seen. Approximately forty seconds later, Subject 2 fled Boost Mobile, and the silver vehicle pulled in front of Boost Mobile. According to the Eternal Bridal video, the silver vehicle came from the east end of the shopping center. Based on a review of video from the various cameras located in the shopping center, the silver vehicle seen at different times is believed to be the same based on color, doors, body style, lights, and wheel style.



(Eternal Bridal video of silver vehicle in parking lot prior to Boost Mobile robbery)

13. Law enforcement received information from a witness who described the getaway vehicle as a silver Mitsubishi Galant with the last four digits of the license plate as either 4967 or 4667. Through database checks, specifically FLOCK, which is a license plate reader ("LPR") platform, law enforcement identified a silver Mitsubishi Galant with Virginia license plate

TVF3999 (“Mitsubishi Galant”) that appeared similar in appearance to that of the getaway vehicle based on images seen in FLOCK.

14. Law enforcement contacted the owner of the Mitsubishi Galant on July 26, 2024, and learned that the vehicle was a rental car. The owner advised that he rents multiple vehicles through Turo, a peer-to-peer car sharing marketplace that allows users to rent cars directly from owners. Beginning on or around June 26, 2024 (i.e., approximately one month before the Boost Mobile robbery), the Mitsubishi Galant was rented to a female renter (referred to herein by her initials A.S.V.S.). The owner advised that at approximately 2:24 p.m. on July 25, 2024 (i.e., 3 hours after the Boost Mobile robbery), that A.S.V.S. asked to trade the Mitsubishi Galant in for another vehicle. On July 26, 2024, the Mitsubishi Galant was traded in for a Honda Accord. The owner advised that he did not have face-to-face contact during the trade-in. On July 26, 2024, law enforcement conducted a consent search of the Mitsubishi Galant and processed it for evidence, including latent prints. According to a report dated August 16, 2024, the latent prints were examined and at least one print was identified to PAIGE and at least one print was identified to A.S.V.S.

15. FLOCK data placed the Mitsubishi Galant near an Exxon gas station (“Exxon”) located at 6261 Little River Turnpike, Alexandria, Virginia (i.e., approximately one mile from the Boost Mobile), at approximately 9:10 a.m. on July 25, 2024 (i.e., approximately two hours before the Boost Mobile robbery). Exxon surveillance video showed the Mitsubishi Galant enter the parking lot. (Timestamps for the Exxon video appear to be approximately 1 hour behind compared to the FLOCK data.) In video from an exterior camera, the license plate is visible as Virginia tag TVF3999. A black male subject exited the vehicle from the driver’s door. The subject went inside the Exxon and purchased two drinks and what appeared to be a packaged set of white gloves with

red/orange palms. (Your affiant later went to this Exxon and confirmed that packaged sets of white gloves with red/orange palms are displayed on the same shelf and appear in the same packaging as the item purchased by the subject.) This subject had long dreadlocks and multiple tattoos on both forearms and wore white sneakers with black trim, which appeared similar to the sneakers worn by Subject 2 in the Boost Mobile robbery.



(Subject purchasing gloves inside Exxon)



(Subject's sneakers inside Exxon)

16. The Mitsubishi Galant in the Exxon video appeared similar to the Boost Mobile robbery getaway vehicle based on color, taillight configuration, hubcaps, black grill, and what appeared to be an air freshener hanging from the rearview mirror. In addition, pictures taken of the Mitsubishi Galant during the consent search on July 26, 2024, showed all those same characteristics, including the air freshener. During the consent search, the Mitsubishi Galant had minor damage including scratches on the right front passenger side bumper. In the Eternal Bridal video, those scratches are faintly visible on the bumper.



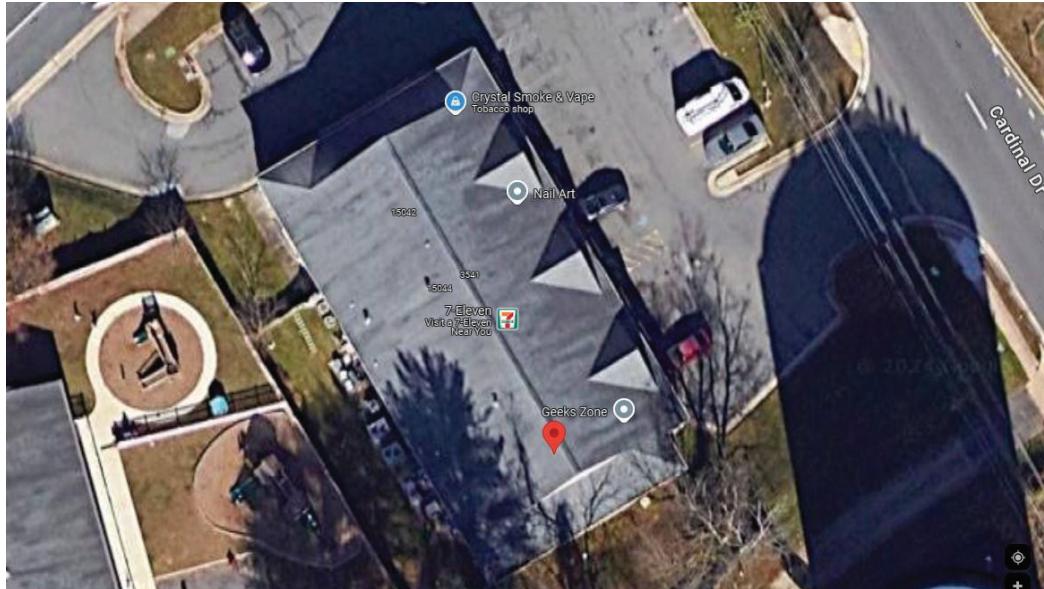
(Mitsubishi Galant at Exxon)



(Mitsubishi Galant at Exxon)

The Geeks Zone Robbery

17. On August 13, 2024, at approximately 12:14 p.m., two subjects robbed the Geeks Zone store (“Geeks Zone”) located at 15060 Cardinal Drive, Woodbridge, Virginia, which is in Prince William County within the Eastern District of Virginia. Geeks Zone is a commercial establishment that sells and repairs merchandise, including cellular phones, tablets, and play stations and is a business that was engaged in and that affected interstate commerce. In addition to taking items from two victims inside the store, the subjects stole merchandise from Geeks Zone, including approximately 46 electronic devices, consisting of cellular phones, tablets, iPads, and PlayStations, and approximately \$2,000 in United States currency.



(Google Maps Aerial View of 15060 Cardinal Drive, Dumfries, Virginia)

18. Based on surveillance video from Geeks Zone, which included an audio recording from a camera inside the store, the two subjects can be described as follows. One individual – referred to herein as “Subject 1” (who, as explained in this affidavit, is believed to be the same as Subject 1 from the Boost Mobile robbery and was later identified as KIRKLAND) – wore a gray hooded sweatshirt, dark pants, New Balance sneakers (which appeared similar to Subject 1’s sneakers in the Boost Mobile robbery), and white gloves with red/orange palms (which appeared similar to the gloves worn by both subjects in the Boost Mobile robbery). Subject 1 had the hood of his sweatshirt pulled up over his head and appeared to be wearing a black mask over the lower portion of his face. Subject 1 was armed with a handgun. The second individual – referred to herein as “Subject 2” (who, as explained in this affidavit, is believed to be the same as Subject 2 from the Boost Mobile robbery and was later identified as PAIGE) – wore a black Reebok sweatshirt with white trim, white shirt underneath, multicolored underwear, dark pants, white sneakers with black trim (which appeared similar to Subject 2’s sneakers in the Boost Mobile robbery), and white gloves with red/orange palms (which appeared similar to the gloves worn by

both subjects in the Boost Mobile robbery). Subject 2 carried a dark duffle bag and was also armed with a black handgun. Subject 2 had the hood of his sweatshirt pulled up over his head and appeared to be wearing a black mask over the lower portion of his face.



(Subject 2's sneakers)

19. At the time of the robbery, Geeks Zone was occupied by an intern of the store (“Victim 1”) and the owner of the store (“Victim 2”).<sup>1</sup> According to Geeks Zone video, both subjects entered the store carrying orange traffic cones, which they dropped as they ran toward the back of the store and out of view of the cameras. According to the audio recording, one or both of the subjects ordered the victims to the ground, asking where the money was, and one of the subjects said “fill it up” and “put the money in the bag” several times. According to the audio recording, one of the subjects counted down from five. The audio recording also captured one subject threatening to shoot, to which the other subject stated: “do not shoot him.”

20. According to Geeks Zone video, Subject 1 had Victim 1 go to the front of the store and demanded money from the register. Victim 1 appeared dazed and shook his head. Victim 1 was bleeding from the back of his head. Victim 1 was unable to open the register, and Subject 1

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<sup>1</sup> “Victim 1” and “Victim 2” in the Geeks Zone robbery are different individuals from “Victim 1” and “Victim 2” in the Boost Mobile robbery, though the victims are referred to consistently within the context of each robbery.

pushed Victim 1 back to the rear of the store while saying: "I'm about to shoot you, come back here, you're dead." The Geeks Zone video showed a portion of Subject 1's gun, which appeared to have a tan/brown slide.

21. According to Geeks Zone video, Subject 2 then brought Victim 2 at gun point to the front of the store to open the register. Victim 2 was holding the top of his head, which also appeared to be bleeding. Victim 2 was able to open the register, and Subject 2 then told Victim 2 to go back to the rear of the store. Eventually both subjects brought both victims back to the front of the store. Subject 1 had Victim 1 hold open a dark-colored laundry-type bag as he emptied merchandise from the display cases into it. In addition to the dark-colored laundry-style bag Subject 1 had, Subject 2 had a big duffle bag that he stuffed merchandise into. Subject 1 fled through the front door of the store, followed by Subject 2 several seconds later.

22. Victim 2 called law enforcement, and PWCPD responded to the scene and interviewed the victims. Victim 2 advised that the subjects stole his wallet, which included a few hundred dollars, and that he was struck in the head by one of the subjects with a gun. Victim 1 also advised that he was struck by one of the subjects with a gun and that they took cash from his wallet.

23. Law enforcement canvassed and determined that the subjects originally came from an area to the rear of Geeks Zone. Surveillance video was collected from a tobacco store at the end of the shopping center that showed Subject 1 and Subject 2 walking toward the Geeks Zone prior to the robbery from the direction of the Montclair Montessori School. Both subjects were carrying the orange traffic cones, which they dropped inside Geeks Zone. Both subjects' masks were pulled down at this point, and they both appeared to be black males.



(Subjects 1 &amp; 2 walking toward Geeks Zone)

24. Two witnesses who were together at the time called 911 and reported seeing a vehicle, which they described as a gray Toyota Prius, drop off two black males wearing "hoodies," one black and the other gray. The witnesses saw the subjects carrying orange traffic cones and walking toward the 7-Eleven, which is in the direction of and in the same shopping center as Geeks Zone. The witnesses saw the subjects return to the same vehicle carrying either large trash bags or duffle bags, and the vehicle ran a red light while fleeing the area. The driver was a heavier set black or Hispanic female, who one of the witnesses described as wearing a light-colored tank top. The witnesses captured pictures of the vehicle. It should be noted that these witnesses were located behind the Geeks Zone and adjacent to the Montclair Montessori School.



(Witnesses' picture of vehicle)

25. On August 20, 2024, law enforcement contacted one of the witnesses, who provided a similar description to the witnesses' 911 call. The witness advised that at the time it happened, the witness believed the vehicle was a Toyota Prius but was now not sure. The witness advised that the vehicle had the look of a Prius. The witness described the driver as a "larger framed," probably a black female who looked young, in her early to mid-twenties. She further described the driver as possibly wearing a peach or off-white sleeveless top. The witness described the driver's hair as curly with volume that was possibly black or brown and might have had bleached tips. When asked, the witness stated that the driver was not wearing glasses. In addition, the witness stated that the female driver was the only one in the vehicle waiting.

Identification of PAIGE, KIRKLAND, and ARCHIE

26. FCPD learned from PWCPD of the Geeks Zone robbery. Through investigative steps already pursued and ongoing by FCPD, investigators knew that A.S.V.S. (the female renter of the Mitsubishi Galant at the time of the Boost Mobile robbery) was renting a Toyota Scion ("Toyota Scion") during the Geeks Zone robbery and was possibly staying at a Red Roof Inn located at 17113 Dumfries Road, Dumfries, Virginia. Through social media analysis, a connection was discovered between A.S.V.S. and a Facebook profile with the name "Javon Page." The Facebook account for "Javon Page" included a series of pictures depicting a black male who matched the subject shown in the Exxon video, including a distinctive tattoo of a woman's face on his forearm. This tattoo could be seen in the Exxon video.

27. At that point, through records including prior police contacts, law enforcement identified the person depicted in the Facebook account for "Javon Page" and the Exxon video as PAIGE.



(Virginia DMV photo of PAIGE)

28. FCPD obtained arrest warrants for PAIGE for the Boost Mobile robbery, and PWCPD arrested him in Manassas, Virginia, on August 14, 2024. At the time of his arrest, law enforcement observed PAIGE near the Toyota Scion and interacting with an individual later identified and whose initials are J.J.M.<sup>2</sup> Law enforcement could see what appeared to be a gun located between the driver's seat and middle console of the Toyota Scion.

29. On August 14, 2024, FCPD and PWCPD executed a search warrant at the Red Roof Inn in Dumfries, Virginia, where it was believed PAIGE was staying. During that search, law enforcement recovered white sneakers with black trim consistent with Subject 2's sneakers in both robberies.

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<sup>2</sup> At the time of PAIGE'S arrest, law enforcement detained and questioned J.J.M. It was reported that J.J.M. had a gap in his front teeth. Video from the tobacco store for the Geeks Zone robbery captured Subject 1 outside the Geeks Zone with his mask pulled down; a review of that video showed that Subject 1 appeared to have a gap in between his front teeth. (At the time of KIRKLAND's later arrest on August 29, 2024, law enforcement who interviewed KIRKLAND advised that KIRKLAND also had a gap between his front teeth.) After questioning, law enforcement determined that J.J.M. was not directly involved in the Geeks Zone robbery, and he was released.

Virginia Department of Corrections records show that J.J.M. was incarcerated at the same correctional institution as PAIGE and KIRKLAND in 2023.

30. On August 16, 2024, FCPD executed a search warrant for the Toyota Scion and seized a black handgun. In addition, other items seized included: a black Reebok sweatshirt with white trim; several bottles of pepper spray; packaging with Geeks Zone labels and identifications numbers that matched the Geeks Zone inventory list of stolen merchandise; a phone with a Geeks Zone label that was on the Geeks Zone inventory list of stolen merchandise; and a driver's license and birth certificate for Victim 2 from the Boost Mobile robbery. The Reebok sweatshirt was consistent in appearance to what was viewed in the Geeks Zone video.



(Gun from Toyota Scion)



(Gun from Geeks Zone ATI Bulletin)

31. Law enforcement collected surveillance video from the Red Roof Inn and surrounding area that revealed the following: On August 13, 2024, prior to the Geeks Zone robbery, PAIGE was both inside and outside the Red Roof Inn. (According to Google Maps, the Red Roof Inn is approximately 4.5 miles from Geeks Zone.) PAIGE wore white sneakers with black trim (which appeared similar to the sneakers worn by Subject 2 in both the Boost Mobile and Geeks Zone robberies) and multicolored underwear (which appeared similar to the multicolored underwear worn by Subject 2 in the Geeks Zone robbery). Based on another camera angle, a person believed to be PAIGE retrieved items from the Toyota Scion. A gray vehicle, which was later determined to be a Honda ("Honda"), arrived at the Red Roof Inn. A black male wearing

a gray hooded sweatshirt and dark pants (which appeared similar to the clothing worn by Subject 1 in the Geeks Zone robbery) exited the front passenger seat of the Honda, walked over to PAIGE at the Toyota Scion, and later returned to the front passenger seat of the Honda. PAIGE eventually got into the Honda's rear passenger driver's side seat and was carrying a bag, and the Honda exited the parking lot of the Red Roof Inn.

32. As the Honda navigated to the main road, it passed surveillance cameras located at an adjacent Motel 6. (There is a discrepancy in video timestamps in that the timestamp of the Red Roof Inn video is approximately 12 minutes behind the timestamp of the Motel 6 video.) Motel 6 video showed that the Honda appeared to have a Virginia license plate. Law enforcement attempted variations of the plate that could be read from the video surveillance and eventually determined the vehicle to be a 2012 Honda bearing Virginia license TJX6878. The vehicle was registered to ARCHIE. The Honda is a hatchback and has features similar to that of a Toyota Prius, which witnesses described as the Geeks Zone robbery getaway vehicle.



(Motel 6 video still images of vehicle)

33. Surveillance video from the Red Roof Inn also showed a similar looking Honda return shortly after the Geeks Zone robbery. Based on the Red Roof Inn video, PAIGE exited the

rear driver's side passenger door. Paige wore a white shirt and white sneakers with black trim and appeared to have the black sweatshirt with white trim draped over his shoulder. PAIGE carried a black duffle bag similar to what Subject 2 carried; notably, the shoulder strap of the black duffle bag was not completely attached in both the Red Roof Inn video and the Geeks Zone video.



(Still image of vehicle at Red Roof Inn  
before robbery)



(Still image of vehicle at Red Roof Inn  
after robbery)

34. Law enforcement obtained an inventory list of the stolen items from both the Boost Mobile and Geeks Zone robberies, including the IMEI numbers of cellular phones. Through an IMEI search, law enforcement learned that numerous stolen cell phones were sold to EcoATMs located inside stores. An EcoATM is an automated kiosk that pays cash instantly for recycling cell phones to help reduce electronic waste. According to the EcoATM website, a state-issued identification is required to sell a device.

35. On August 13, 2024, at approximately 1:15 p.m. (i.e., approximately one hour after the Geeks Zone robbery), phones taken in the Geeks Zone robbery were sold at an EcoATM located inside a Walmart at 5885 Kingstowne Boulevard, Alexandria, Virginia. According to Google Maps, the Walmart is approximately 20 miles from the Red Roof Inn. EcoATM records showed that a black male using a District of Columbia driver's license bearing a name with initials K.M. sold approximately five phones taken in the Geeks Zone robbery. (The black male using the EcoATM was later determined to be KIRKLAND, who presented an identification with someone else's name; the District of Columbia driver's license bearing the name with initials K.M., which

was recovered after the arrest and execution of the search warrant at KIRKLAND's residence, was located inside a wallet also containing an identification in KIRKLAND's name.) The black male had long dreadlocks, wore gray New Balance sneakers (which appeared similar to Subject 1's sneakers in both robberies), and appeared to wear a GPS monitoring device on his ankle.

36. At that time, the black male was accompanied by a female who attempted to sell a phone to the EcoATM that was taken in the Geeks Zone robbery. This female also sold another phone at the time to the EcoATM that was not on the Geeks Zone stolen inventory list. The female matched the witnesses' description of the getaway driver for the Geeks Zone robbery. Surveillance video and still images showed that the female, who wore a tan/cream-colored sleeveless bodysuit, was heavier set with somewhat curly hair that appeared to be dyed on the ends. The female provided a Virginia driver's license with the name BRIANNA MAMIE OCEOLIA ARCHIE (i.e., the registered owner of the Honda believed to be the Geeks Zone robbery getaway vehicle). Surveillance video and still images of the Walmart parking lot revealed that ARCHIE and the black male arrived in what appeared to be the Honda and walked into the store together. Based on surveillance video, ARCHIE and the black male at times stood together; at one moment, ARCHIE touched the forearm area of the black male and picked something off his shirt; and, at another point, ARCHIE held a phone to her ear, while the black male stood in front of the EcoATM.



(Inside Walmart)



(Inside Walmart at EcoATM)



(EcoATM image of KIRKLAND using K.M. DC ID)



(EcoATM image of ARCHIE)

37. According to EcoATM records, ARCHIE sold several other phones both before and after the Geeks Zone robbery. At approximately 7:12 p.m. on August 11, 2024 (i.e., approximately 19 days after the Boost Mobile robbery), ARCHIE sold a cellular phone taken in the Boost Mobile robbery to an EcoATM inside the same Walmart. On August 13, 2024, at approximately 5:13 p.m. (i.e., approximately 5 hours after the Geeks Zone robbery), at the same Walmart, ARCHIE sold two cellular phones, one of which was taken in the Geeks Zone robbery. On August 14, 2024, at approximately 10:34 a.m. (i.e., the day after the Geeks Zone robbery), ARCHIE sold a cellular phone taken in the Geeks Zone robbery at an EcoATM located inside a Safeway Grocery store located at 6118 Arlington Boulevard, Falls Church, Virginia. Several minutes prior, the black male

using the same District of Columbia driver's license bearing the name with initials K.M. attempted to sell a cellular phone stolen in the Geeks Zone robbery. An image from the EcoATM showed ARCHIE standing next to the black male.

38. On August 29, 2024, ARCHIE was arrested for possession of stolen property by FCPD. During a recorded interview, ARCHIE admitted to being the driver during the Geeks Zone robbery, to selling the phones at the EcoATMs, and to being aware that "Cosmo" (who law enforcement has identified as PAIGE) and KIRKLAND had guns; ARCHIE claimed she felt threatened and was forced to participate.

39. During the course of the investigation, law enforcement identified the black male shown with ARCHIE at the EcoATMs as KIRKLAND. KIRKLAND was on GPS monitoring as a condition of his pretrial release for a pending D.C. Superior Court case. Preliminary GPS records received by law enforcement showed KIRKLAND's GPS placed him in the area at the dates and times of the Boost Mobile and Geeks Zone robberies. (Official GPS records obtained from the District of Columbia Pretrial Services after KIRKLAND's arrest showed that KIRKLAND was: in and around the area at the times of both robberies; at the Exxon when PAIGE was there on July 25, 2024; at the Red Roof Inn consistent with the times the Honda was there on August 13, 2024; and at the Walmart after the Geeks Zone robbery.)

40. On August 29, 2024, KIRKLAND was arrested at his residence in Falls Church, Virginia by FCPD during the execution of a search warrant. During the search of the residence, FCPD seized items including a handgun with a tan/brown slide that was found in a bag also containing a credit card in KIRKLAND's name; that handgun was consistent in shape and size with the handgun carried by Subject 1 in the Geeks Zone robbery. Also found in the residence was

another handgun, as well as a cellular phone and iPad box with IMEI numbers associated with stolen merchandise from the Geeks Zone.

41. Cellular phone records were obtained and revealed that ARCHIE's phone number was in contact with KIRKLAND's phone number, including before, the day of, and after the Geeks Zone robbery.

42. Records were also obtained from the Virginia Department of Corrections. Those records showed that PAIGE and KIRKLAND were incarcerated at the same correctional institution in 2023. Pictures of PAIGE also showed the distinctive tattoo of a woman's face on his arm, as also seen in the Exxon video.

### **CONCLUSION**

43. Based on the foregoing, I respectfully submit that there is probable cause to believe that PAIGE and KIRKLAND used, carried, and brandished a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. § 924(c)(1)(A)(ii), and that ARCHIE committed Hobbs Act robbery, in violation of 18 U.S.C. §§ 1951 and 2.

Respectfully submitted,

CHARLES ROONEY  
Digitally signed by CHARLES  
ROONEY  
Date: 2024.12.10 08:30:01 -05'00'

Charles Rooney  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to in accordance  
with Fed. R. Crim. P. 4.1 by telephone  
on December 10, 2024:

Lindsey R Vaala  
Digitally signed by Lindsey R  
Vaala  
Date: 2024.12.10 11:48:58 -05'00'

The Honorable Lindsey R. Vaala  
United States Magistrate Judge